

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION

00-6016

CASE NO.:

CIV - UNGARO - BENAGES

SAINTIL SAINTILUS

Plaintiff,

v.

NAMASCO CORPORATION
and NAMASCO CORPORATION
d/b/a NAMASCO STEEL
COMPANY

Defendant.

**NIGHT BOX
FILED**

JAN 5 2000

CLARENCE MADDOX
CLERK, USDC / SDFL / FTL

NOTICE OF REMOVAL

Defendant, Namasco Corporation and Namasco Corporation d/b/a Namasco Steel Company ("Namasco"), files its Notice of Removal of an action pending in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, to the United States District Court, Southern District of Florida, Ft. Lauderdale Division, being the district and division in which the action is pending, and states as follows:

1. Plaintiff commenced this action against Namasco in the Circuit Court of the Seventeenth Judicial Circuit in and for Broward County, Florida, in a case styled Saintil Saintilus v. Namasco Corporation and Namasco Corporation d/b/a Namasco Steel Company, Case No. 99020917-CACE-08.

2. All process, pleadings, and orders, as well as all pending motions which have been filed in this case, are attached to this Notice of Removal.

3. This action was commenced when Plaintiff filed his Complaint on or about December 10, 1999. A summons and the Complaint were served on Namasco on

1/BJ

December 15, 1999. Accordingly, pursuant to 28 U.S.C. § 1446(b), Namasco has timely filed this Notice of Removal in that it is being filed within thirty (30) days from service.

4. This Court has original jurisdiction of the action under the provisions of 28 U.S.C. § 1441, in that it is a civil action of which the district courts have original jurisdiction founded on a claim or right arising under the laws of the United States.

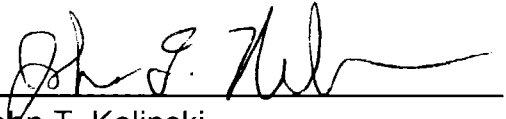
5. Plaintiff's Complaint alleges that he was discriminated against in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000 et seq. Because the Complaint claims Title VII, removal is proper pursuant to 28 U.S.C. § 1441 and 29 U.S.C. § 633a(c).

6. Namasco respectfully requests that the United States District Court for the Southern District of Florida accept this Notice of Removal and that it assume jurisdiction of this cause and issue such further orders and process as may be necessary to bring before it all parties necessary for the trial hereof.

WHEREFORE, Defendant, Namasco Corporation and Namasco Corporation d/b/a Namasco Steel Company, prays that the above action be removed from the Circuit Court for the Seventeenth Judicial Circuit in and for Broward County, Florida, to the United States District Court for the Southern District of Florida.

Respectfully submitted,

SHUTTS & BOWEN
Attorneys for Defendant
201 S. Biscayne Boulevard
1500 Miami Center
Miami, Florida 33131
(305) 358-6300
(305) 347-7386 (Facsimile)

By: 
John T. Kolinski
Florida Bar No. 307971
Jennifer J. Ator
Florida Bar No. 0120911

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on this 4th day of January, 2000 to John D. Ameen, Esq., Ameen & Drucker, P.A., 3111 University Drive, Suite 608, Coral Springs, Florida 33065.


OF COUNSEL

MIADOCS 309202.1 MIV

CACE

IN THE CIRCUIT COURT FOR THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLOIRDA

SAINTIL SAINTILUS

Plaintiff

Case No.

v.
NAMASCO CORPORATION
and NAMASCO CORPORATION
d/b/a NAMASCO STEEL
COMPANY

99020917

08

Defendant.
_____ /

SUMMONS

STATE OF FLORIDA
To each Sheriff of Said State

YOU ARE HEREBY COMMANDED to serve this summons, a copy of the on
Defendant, Namasco Corporation by serving its registered agent:

James Boedeher
907 S. 20th Street
Tampa, Florida 33605

Each Defendant is required to serve written defenses to the Complaint or petition John D. Ameen, Plaintiffs' attorney whose address is Ameen & Drucker, P.A., 3111 University Drive, Suite 608, Coral Springs, FL 33065, Telephone (954) 340-7277, within twenty (20) days after service of the summons on the Defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of the court either before service on the plaintiffs' attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED on DEC 10 1999, 1999

James Boedeher

12-15-99

3:10P

Donald Rva

ROBERT C. LOCKWOOD

Clerk of the Court

STUART SMITH

By: _____

As Deputy Clerk

A TRUE COPY

Circuit Court Seal

CACE

IN THE CIRCUIT COURT FOR THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

SAINTIL SAINTILUS

Plaintiff

Case No.

99020917

v.

NAMASCO CORPORATION
and NAMASCO CORPORATION
d/b/a NAMASCO STEEL
COMPANY

Defendant.

A TRUE COPY
ROBERT E. LOCKWOOD

08

COMPLAINT

DEC 10 1999

THE Plaintiff, SAINTIL SAINTILUS, by and through his undersigned attorneys,
hereby sues the Defendant, NAMASCO CORPORATION and NAMASCO
CORPORATION d/b/a NAMASCO STEEL COMPANY (hereinafter NAMASCO) and
alleges as follows:

1. This is an action for damages brought pursuant to the Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. (hereinafter referred to as Title VII), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, 105 Stat. 1071 (1991), and the Florida Civil Rights Act of 1992, at Fla. Stat. §§760.01 through 760.11.
2. This is an action for damages in excess of \$15,000, exclusive of interest, cost, and attorneys' fees.
3. At all times material hereto the Plaintiff, SAINTIL SAINTILUS , was and is a resident of Broward County, Florida.
4. Plaintiff, SAINTIL SAINTILUS, is a citizen of the United States of America.

5. Plaintiff was employed with Defendant, NAMASCO , at its business location on 1621 NW 12th Avenue, Pompano Beach, FL. Defendant, NAMASCO, is a foreign corporation and at all times material hereto has carried on a business in Florida, has an office or agency in Florida, and has engaged in substantial and not isolated activity within Florida.
6. At all times material hereto, Plaintiff, SAINTIL SAINTILUS, was an employee of Defendant, NAMASCO
7. At all times material hereto, Defendant, NAMASCO, was and continues to be an employer within the meaning of Title VII.
8. On December 1, 1998, the Plaintiff, SAINTIL SAINTILUS, filed a charge of discrimination with the Equal Opportunity Employment Commission (EEOC), attached hereto as exhibit "A".
9. On September 20, 1999 Plaintiff, SAINTIL SAINTILUS, was issued a Notice of Right to Sue, attached hereto as exhibit "B".
10. Plaintiff also timely filed his charge of discrimination with the Florida Commission on Human Relations.
11. Immediately prior to his discharge Plaintiff held the position of supervisor.
12. At all times material hereto, Plaintiff, SAINTIL SAINTILUS, possessed the skills, experience, attributes and training required for the position of supervisor at Defendant.
13. On or about 7/13/98, Plaintiff was discharged by Defendant, NAMASCO. Defendant has alleged that Plaintiff was discharged for fighting. However, Defendant was made

aware by the Pompano Beach Police Department that Plaintiff had not engaged in fighting.

14. Prior to the alleged date of discharge, management at Defendant had made disparaging remarks about Plaintiff's national origin.
15. Additionally, management at Defendant told Plaintiff that he was making too much money for a Haitian.
16. Defendant, NAMASCO, has discriminated against Plaintiff, SAINTIL SAINTILUS, in his employment because of his national origin.
17. Defendant, NAMASCO, terminated Plaintiff's employment because of his national origin .
18. Defendant, NAMASCO'S, actions set forth in this Complaint were intentional and malicious or done with reckless indifference to Plaintiff's protected rights under federal and state law.
19. The Plaintiff, SAINTIL SAINTILUS, has been required to retain the legal services of the law firm AMEEN & DRUCKER, P.A., and has agreed to pay them a reasonable attorney's fee for those services.

COUNT I

TITLE VII – RACIAL DISCRIMINATION

Plaintiff, SAINTIL SAINTILUS, realleges and reavers Paragraphs one through nineteen as if fully set forth herein and would further allege as follows:

20. Defendant, NAMASCO, discriminated against and terminated Plaintiff, SAINTIL SAINTILUS, because of his national origin.

21. The unlawful discriminatory pattern, practice, usage and custom by Defendant, its agents, and its employees, as set forth herein, violates Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, 105 Stat. 1071 (1991).

22. As a direct and proximate result of Defendant, NAMASCO'S, unlawful and discriminatory employment practices and policies, Plaintiff, SAINTIL SAINTILUS, has suffered damages and will continue to suffer irreparable injury and damages in the future, including, but not limited:

- a. Loss of past and future income.
- b. Loss of other fringe benefits.
- c. Stress; anxiety and emotional distress.
- d. Other financial losses.

23. Plaintiff, SAINTIL SAINTILUS, is entitled to an award of reasonable attorney's fees, expert fees, costs and expenses related to the litigation pursuant to 706(k) of Title VII, 42 U.S.C. § 2000c-5(k), as amended by Section 11 of the Civil Rights Act of 1991.

WHEREFORE, Plaintiff, SAINTIL SAINTILUS, demands judgment for damages against the Defendant, NAMASCO, together with interest and costs and demands trial by jury of all issues triable as of right by jury and requests that judgment be entered in his favor against, Defendant, NAMASCO:

- A. Declaring, pursuant to 28 U.S.C. § 2201 that the acts and practices complained of herein are in violation of Title VII;
- B. Permanently enjoining Defendant, NAMASCO, from continuing and/or maintaining the policy, practice, and custom of denying, abridging, withholding

or conditioning the federally protected rights of employees on the basis of national origin and color;

- C. Awarding Plaintiff, SAINTIL SAINTILUS, back pay, pre-judgment interest, post-judgment interest, and damages for all employment and retirement benefits he would have received but for Defendant, NAMASCO'S, acts and practices;
- D. Awarding Plaintiff, SAINTIL SAINTILUS, front pay in lieu of reinstatement;
- E. Awarding Plaintiff, SAINTIL SAINTILUS, all compensatory and punitive damages provided for in 42 U.S.C. § 1981a.
- F. Awarding reasonable attorney's fees, expert fees, and costs in this action pursuant to Section 706 (d) of Title VII, 42 U.S.C. 2000(e)-5(k), as amended by Section 113 of the Civil Rights Act of 1991;
- G. Awarding Plaintiff, SAINTIL SAINTILUS, all other sums of money, medical benefits and other employment benefits with interest thereon, to which Plaintiff is entitled; and
- H. Ordering any other relief as this court deems just and proper.

COUNT II VIOLATION OF THE FLORIDA CIVIL RIGHTS ACT OF 1992
DISCRIMINATION

Plaintiff, SAINTIL SAINTILUS, realleges and reavers Paragraphs one through nineteen as if fully set forth herein and would further allege as follows:

- 24. This is an action for affirmative relief, equitable relief, damages and all other remedies for unlawful discrimination under the Florida Civil Rights Act of 1992, at Fla. Stat. §§760.01 through 760.11.

25. Plaintiff, SAINTIL SAINTILUS, is an aggrieved person within the meaning of Fla. Stat. 760.02.
26. Defendant, NAMASCO, has employed and does employ 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year, is an employer as defined by Fla. Stat. 760.02, and is capable of being sued under Fla. Stat. 760.11.
27. Defendant, NAMASCO, intentionally discriminated against Plaintiff, SAINTIL SAINTILUS, by discharging him.
28. Defendant intentionally discriminated against Defendant because of his national origin and race.
29. Defendant's acts were intentional and violate the Florida Civil Rights Act of 1992.
30. As a direct and proximate result of Defendant's acts, Plaintiff has suffered and continues to suffer lost employment, income, benefits, and has suffered and continues to suffer distress, humiliation, embarrassment, and damage to his reputation.
31. Plaintiff has exhausted his administrative remedies required by Fla. Stat. 760.11 and has otherwise fulfilled all other prerequisites to bringing this action.
32. Fla. Stat. 760.11 authorizes the Court to issue an order prohibiting the discriminatory practices, equitable relief and the award of compensatory and punitive damages and attorneys' fees.

WHEREFORE, Plaintiff, SAINTIL SAINTILUS, demands trial by jury and requests this Court to:

- A. Declare that Defendants have unlawfully discriminated against Plaintiff in violation of the Florida Civil Rights Act of 1992; and

- B. Issue and order prohibiting further discrimination; and
- C. Order equitable relief including but not limited to an Order reinstating Plaintiff with all promotions and seniority rights to which he is entitled, backpay and all other equitable relief provided in Fla. Stat. 760.11; and
- D. Award Plaintiff all compensatory and punitive damages provided for in Fla. Stat. 760.11; and
- E. Award Plaintiff his costs, attorneys' fees, attorneys' fees and such other and further relief, as the Court deems proper.

Respectfully submitted this 9th day of December, 1999.

AMEEN & DRUCKER, P.A.
Attorneys for Plaintiff
3111 University Drive, Ste. 608
Coral Springs, FL 33065
(954) 340-7277
Fax (954) 340-8733

By: 

John D. Ameen
FL Bar. No. 0008036

U.S. Equal Employment Opportunity Commission
DISMISSAL AND NOTICE OF RIGHTS

To: Saintil Saintilus
 113 NE 5th Street
 Pompano Beach, FL 33060

From: Miami District Office
 Equal Employment Opportunity Commission
 One Biscayne Tower, Suite 2700
 2 South Biscayne Boulevard
 Miami, Florida 33131-1805

☐ On behalf of a person aggrieved whose identity is
 CONFIDENTIAL (29 CFR § 1601.71a)

Charge Number
 15A990172

EEOC Representative
 James Colon, State & Local Coordinator

Telephone No.
 (305) 536-4454

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability that is covered by the Americans with Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ We cannot investigate your charge because it was not filed within the time limit required by law.
- ☐ Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.
- ☐ While reasonable efforts were made to locate you, we were not able to do so.
- ☐ You had 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.
- ☐ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☒ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may pursue this matter further by bringing suit in federal or state court against the respondent(s) named in the charge. If you decide to sue, you must sue WITHIN 90 DAYS from your receipt of this Notice. Otherwise your right to sue based on the above-numbered charge will be lost.

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible. (If you file suit, please send a copy of your court complaint to this office.)

On behalf of the Commission

Federico Costales, District Director

SEP 20 1999
 (Date Mailed)

cc:

Namasco Steel Company

c/o Mr. John T. Kutinski

1500 Miami Center

201 South Biscayne Boulevard

Miami, FL 33131

Mr. John D. Amen

3111 University Drive #608

Coral Springs, FL 33065

CHAR. DISCRIMINATION

AGENCY

CHARGE NUMBER

This form is affected by the Priv. completing this form.

of 1974; See Privacy Act Statement

☐ FEPA
☒ EEOCEM-209-12-98
15A990172

Broward County Human Rights Division

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Mr. Saintil Saintilus

HOME TELEPHONE (Include Area Code)

(954) 927-4649

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

113 N E 5 Street, Pompano Beach, FL 33060

02/02/52

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

Namasco Steel Company

15 - 100 Employees

(954) 785-2850

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

1621 N W 12 Avenue, Pompano Beach, FL 33060

011

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☒ NATIONAL ORIGIN
☐ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify)DATE DISCRIMINATION TOOK PLACE
EARLIEST LATEST

01/02/98 07/13/98

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

1. I was assaulted on the job by a co-worker, derogatory remarks were made about my national origin. I was disciplined and then discharged on 7/13/98 by the respondent because of my national origin. The co-worker who assaulted me was rehired because he is an American. I am Haitian.
2. The respondent stated I was being discharged for fighting and because I was making too much money for a Haitian.
3. I believe I was discriminated against in violation of Title VII of the Civil Rights Act of 1964, the Florida Civil Rights Act (Chapter 760) and Article II, Section 1(a)(1) of the Broward County Human Rights Act.

Sworn to and subscribed before me this
01 day of December, 1998

Eileen K. Smith

Signature of Notary Public-State of Florida

Print, Type or Stamp Name of Notary Public

☐ Personally known to me, or☒ Produced identification: FD # S534-780-52 0420
exp. 2/2/2000 Type of identification☐ I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Saintil Saintilus

Date

1-12-98

Charging Party (Signature)

NOTARY (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Saintil Saintilus

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, month, and year)

01 December 1998

NOTARY PUBLIC
EILEEN K. SMITH
COMMISSIONER 493242
EXPIRE 2/2/2000STATE OF FLORIDA
ATLANTA
JUNIOR CO., INC.

CIVIL COVER SHEET

JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM)

PLAINTIFFS

Saintil Saintilus

COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Broward
(EXCEPT IN U.S. PLAINTIFF CASES)

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE/NUMBER)

John D. Ameen, Esq., 3111 University Dr., #608, Coral Springs, FL 33065

DEFENDANTS

Namasco Corporation and
Namasco Corporation d/b/a
Namasco Steel Company

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT NY

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

MAGISTRATE JUDGE
BROWN

ATTORNEYS (IF KNOWN) John T. Kolinski, Esq. & Jennifer J. Ator, Esq., 1500 Biscayne Blv., #1500, Miami, FL 33131

CIRCLE COUNTY WHERE ACTION AROSE: DADE, MONROE, BROWARD, PALM BEACH, MARTIN, ST. LUCIE, INDIAN RIVER, OKEECHOBEE, HIGHLANDS

BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

U.S. Government Plaintiff ☒ Federal Question (U.S. Government Not a Party)
U.S. Government Defendant ☐ Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

Citizen of This State ☒ PTF ☐ DEF
Citizen of Another State ☐ PTF ☒ DEF
Citizen or Subject of a Foreign Country ☐ PTF ☐ DEF
Incorporated or Principal Place of Business in This State ☐ PTF ☐ DEF
Incorporated and Principal Place of Business in Another State ☐ PTF ☐ DEF
Foreign Nation ☐ PTF ☐ DEF

ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

Original Proceeding ☒ Removed from State Court ☐ Remanded from Appellate Court ☐ Reinstated or Reopened ☐ Transferred from another district (specify) ☐ Multidistrict Litigation ☐ Appeal to District Judge from Magistrate Judgment ☐

NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

| A CONTRACT | A TORTS | FORFEITURE/PENALTY | A BANKRUPTCY | A OTHER STATUTES |
|---|---|--|---|---|
| <input type="checkbox"/> Insurance <input type="checkbox"/> Marine <input type="checkbox"/> Miller Act <input type="checkbox"/> Negotiable Instrument <input type="checkbox"/> Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> Medicare Act <input type="checkbox"/> Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> Recovery of Overpayment of Veterans Benefits <input type="checkbox"/> Stockholders' Suits <input type="checkbox"/> Other Contract <input type="checkbox"/> Contract Product Liability | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth In Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 A PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark | <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions A OR B |
| REAL PROPERTY <input type="checkbox"/> Land Condemnation <input type="checkbox"/> Foreclosure <input type="checkbox"/> Rent Lease & Ejectment <input type="checkbox"/> Torts to Land <input type="checkbox"/> Tort Product Liability <input type="checkbox"/> All Other Real Property | A CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights | PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition | A LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input checked="" type="checkbox"/> 791 Empl. Ret. Inc. Security Act | B SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609 |

CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Title VII of the Civil Rights Act of 1964; 42 U.S.C. 2000e. et. seq.

TH OF TRIAL

days estimated (for both sides to try entire case)

REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 ☐

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ YES ☒ NO

II. RELATED CASE(S) (See instructions) IF ANY

JUDGE

DOCKET NUMBER

SIGNATURE OF ATTORNEY OF RECORD

OFFICE USE ONLY

CEIPT 518228 AMOUNT 150.00 APPLYING IFP JUDGE MAG JUDGE